

## Exhibit R

VOL. I  
PAGES 1-124  
EXHIBITS 1-20

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

\* \* \* \* \*

STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL  
LONGSHOREMEN'S ASSOCIATION,  
AFL-CIO, ET. AL,  
DEFENDANTS.

\* \* \* \* \*

DEPOSITION OF STEPHEN KEEFE, taken on  
behalf of the Defendants, pursuant to the  
applicable provisions of the Federal Rules of  
Civil Procedure, before Bernadette J. D'Alelio,  
Notary Public and Court Reporter within and for  
the Commonwealth of Massachusetts, at the  
Offices of Mullen & McGourty, 52 Temple Place,  
Boston, Massachusetts, on May 8, 2006,  
at 10:01 a.m., as follows:

Page 118

1 you know if it is kept at the union hall or any  
2 other building?  
3 A. The last time I saw a constitution was  
4 from 1998 or something, '94.  
5 Q. That was before you were a member of  
6 805, right?  
7 A. (Witness nodding.)  
8 Q. Prior to being a member of 805, you  
9 were a member of another longshoremen's union,  
10 weren't you?  
11 A. Yes.  
12 Q. That was up in Portsmouth, New  
13 Hampshire?  
14 A. Yes.  
15 Q. What local was that?  
16 A. Local 1947.  
17 Q. Had you ever been summoned before the  
18 rules committee or any hearing officer in 1947  
19 while you were a member there?  
20 A. Not that I recall. I don't think they  
21 had a rules committee.  
22 Q. Prior to filing this litigation, Civil  
23 Action Number 0411340, did you pursue an appeal  
24 of the rules committee's decision with the

Page 119

1 union?  
2 A. For my suspension?  
3 Q. Yes.  
4 A. I didn't know I could appeal.  
5 Q. On April 7, 2003, your attorney wrote  
6 a letter to Mr. Bowers, the president of the  
7 international; is that right?  
8 A. Yes.  
9 Q. And that letter was a complaint made  
10 on your behalf to Mr. Bowers about your  
11 suspension; is that right?  
12 A. Yes.  
13 Q. Prior to that letter being sent to  
14 Mr. Bowers, had you pursued any appeal within  
15 the union, either to the district council or  
16 any other body in accordance with the  
17 constitution?  
18 A. I didn't know you could.  
19 Q. Prior to filing this civil action, had  
20 you pursued any appeal of your suspension  
21 within the union, either to the district  
22 council or any other body pursuant to the  
23 constitution?  
24 A. Say that again, please?

Page 120

1 MR. MAHONEY: Can you read that  
2 back, please, Bernadette?  
3 (Question read.)  
4 A. I didn't know you could.  
5 Q. Do you recall when we were talking  
6 about Exhibit 5 earlier, which are the hiring  
7 hall rules?  
8 A. Yes.  
9 Q. We were previously talking about the  
10 hiring hall rules in regard to the pledge  
11 sheet. Do you recall that?  
12 A. Yes.  
13 Q. What I want to focus your attention  
14 now on is Rule 25. You t  
15 Tell me if I read this incorrectly. I  
16 will try to do it upside down.  
17 "All members who have a grievance must  
18 go through proper channels first before  
19 bringing a lawsuit against the ILA or any  
20 local."  
21 Did I read that correctly?  
22 A. Yes.  
23 Q. "(The channels are as follows: First,  
24 they must go through their local; next, New

Page 121

1 England Dock & Marine Council or Atlantic  
2 District Council; and then the international.)"  
3 Did I read that correctly?  
4 A. Yes.  
5 Q. And these are the hiring hall rules  
6 that were in effect in 2003 at the time of your  
7 suspension; isn't that right?  
8 A. Yes.  
9 Q. And prior to filing this lawsuit, did  
10 you make any request to the New England Dock &  
11 Marine Council or the Atlantic District Council  
12 appealing your suspension?  
13 A. I never read that rule. I didn't know  
14 I could. If I did, I would have went that  
15 avenue.  
16 Q. Your attorney did write to the  
17 president; is that right?  
18 A. Yes.  
19 Q. And you received Mr. Bowers' response,  
20 the president's response, in December 2003;  
21 isn't that right?  
22 A. Yes.  
23 Q. And was it after you received  
24 President Bowers' response that you then filed

31 (Pages 118 to 121)

DUNN &amp; GOUDREAU

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